

Big Bend Broadcasting
13915 Lakeview Dr.
Austin, TX. 78732

Phone 512-266-4561
Email: sbumpous@austin.rr.com

October 15, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: MB Docket No. 02-253
RM-10317

Dear Ms. Dortch

Transmitted herewith on behalf of Big Bend Broadcasting, are an original and four (4) copies of its Counterproposal and Comments in the above referenced proceeding.

In the event that the Commission has questions with respect to any of these matters, please contact the undersigned.

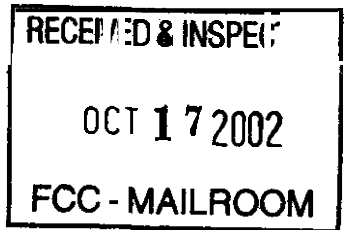
Respectfully,

James S. Bumpous
General Partner
Big Bend Broadcasting
13915 Lakeview Dr.
Austin, TX. 78732

Enclosures

No. of Copies rec'd 074
List ABCDE

Before the
Federal Communications Commission
Washington, DC 20554



In the matter of)	
)	
Amendment of Section 73.202(b))	
Table of Allotments)	MB Docket No.02-253
FM Broadcast Station)	RM-10317
(Rankin, Texas))	

To: Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, DC 20554

COUNTERPROPOSAL AND COMMENTS

Big Bend Broadcasting ("BBB") pursuant to the Notice of proposed Rule Making in the above captioned matter, hereby respectfully submits its Counterproposal, and urges that the public interest, convenience and necessity as well as a fair, efficient and equitable distribution of broadcast facilities would be better served by amendment of the Commission's FM Table of Allotments to allocate Channel 274C1 to Sanderson, Texas as its first full-time aural service.

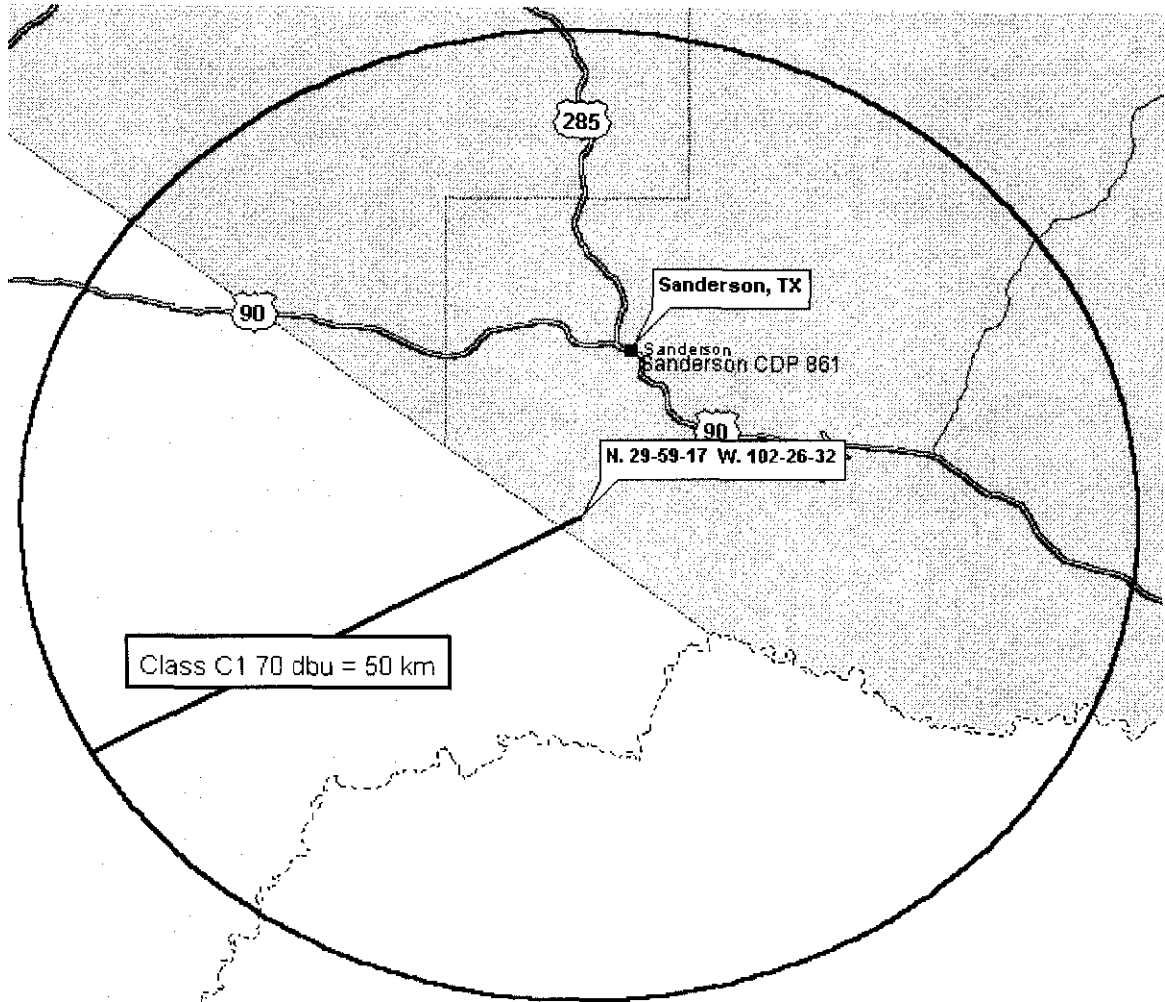
Sanderson, Texas is a census-designated place with Census 2000 population of 861 people. Sanderson is the County Seat for Terrell County. Sanderson has its own Elementary, Junior High School, and High School, Public Library, and seven churches. Sanderson has a bank, five restaurants, two law offices, a real estate office, a health care center, several motels, and numerous other businesses and government agencies. Many of these businesses use the name of Sanderson in their business name. Although Channels 286C2 has been proposed for Sanderson (MB Docket No. 02-247, RM-10536), that channel has not yet been allocated, and therefore, allotment of Channel 274C1 to Sanderson would satisfy Priority (1) of the Commission's allotment priorities (first full-time aural service). Should Channel 286C2 be allocated to Sanderson, the allocation of Channel 274C1 would still satisfy Priority (2) (second full-time aural service).

In contrast, Rankin, Texas receives aural services from several stations including KPDB, KPBM, KKKK, and KWTR (cp), so the allocation of Channel 273C1 to Rankin would only satisfy Priority (3) of the Commission's allotment priorities (first local service). In addition, Sanderson has a population that is 7.5% greater than that of Rankin (861 vs. 800). The allocation of Channel 274C1 to Sanderson would therefore achieve a preferential arrangement of allotments.

Channel 274C1 can be allocated to Sanderson, Texas at reference coordinates of 29° 59' 17" North Latitude, and 102° 26' 32" West Longitude. From these coordinates, 70 dbu coverage can be provided to the entire area of Sanderson, Texas (Ex. #1). Channel 274C1 at these coordinates is also mutually exclusive with the proposed allocation of Channel 273C1 at Rankin, Texas (Ex. #2).

Should the Commission allocate Channel 274C1 to Sanderson, Texas, BBB will apply for that allocation. If BBB is granted a construction permit for Channel 274C1 at Sanderson, BBB will promptly construct and operate the permitted facilities.

EX. #1:



EX. #2

Channel Study for Channel 274C1 at Coordinates:

N. 29° 59' 17"


W. 102° 26' 32"

CH	Class	CallSign	City	State	Co	Status	N	W	Rqd	Dist	Clear
273C1	NEW	RANKIN	TX	US	ADD	31 13 21	101 56 15	177	145.16	-31.9	
273C1	NEW	RANKIN	TX	US	ADD	31 15 3	101 48 9	177	152.84	-24.2	
275C3		OZONA	TX	US	ADD	30 42 30	101 12 6	144	143.55	-0.45	
2738	XHHIHF	OJINAGA	CH	MX		29 32 52	104 23 35	195	194.85	-0.16	
274A		LA ROSITA	CI	MX		28 21 25	101 39 50	196	196.01	0	
2738		OJINAGA	CH	MX		29 33 53	104 25 23	195	197.19	2.18	
274B		CAJONCITOS	CH	MX		30 56 0	105 29 30	270	311.02	41.01	
2758		VILLA UNION	CI	MX		28 14 0	100 44 30	195	255.4	60.4	
276B		CIUDADACUNA	CI	MX		29 19 33	100 55 51	79	163.73	84.72	
272A		CIUDADACUNA	CI	MX		29 19 33	100 55 51	74	163.73	89.72	

All information contained herein is true and correct to the best of my knowledge and belief. My qualifications are a matter of record with the Federal Communications Commission.

Respectfully submitted,

Big Bend Broadcasting

By: 
James S. Bumpous
General Partner

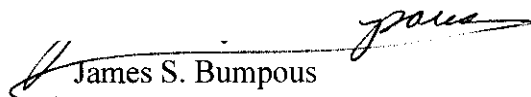
Dated October 14, 2002 Big Bend Broadcasting
13915 Lakeview Dr.
Austin, Texas 78732

Certificate of Service

I certify that on this 14th day of October, 2002, I caused to be sent by U.S. Mail, postage prepaid, copies of the foregoing Counterproposal to the following:

Katherine Pyeatt
6655 Aintree Circle
Dallas, TX 75214

Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, DC 20554


James S. Bumpous